

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

*In re Search Warrants Dated November 3
and November 5, 2021*

Related to: 20 Mag. 12614
20 Mag. 12623
21 Mag. 548
21 Mag. 992
21 Mag. 2537
21 Mag. 2711
21 Mag. 3884

Case Nos. 21 Misc. 813 (AT)
21 Misc. 819 (AT)
21 Misc. 825 (AT)

**AFFIDAVIT IN SUPPORT OF REPLY IN SUPPORT OF JOINT PETITION FOR
RETURN OF PROPERTY**

STATE OF Texas)
)ss.:
COUNTY OF Harris)


Christopher Smith, being duly sworn, deposes and says:

1. I am over eighteen years of age and am competent to testify to the matters set forth herein.
2. I am a Senior Project Manager for Transperfect Legal Solutions.
3. Project Veritas and its legal counsel retained Transperfect to manage data provided by Microsoft that I understand is a copy of the production it made to the government in this matter.
4. Microsoft provided the data directly to Transperfect on a hard drive via Federal Express.
5. Transperfect copied the Microsoft data to its proprietary platform known as Digital Reef, which allows me to apply pre-review analytics to the data and assess the dates of the documents within the data set.
6. My review of the Microsoft data using the pre-review analytics tool indicates the following:
 - i. The data is composed of 199,816 unique (i.e., non-duplicate) documents.

- ii. 149,901 of these unique documents are dated prior to September 3, 2020.
- iii. 18,392 of these unique documents are dated after November 8, 2020.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 18, 2022.



Christopher Smith